

EXHIBIT A

Mark C. Mao, CA Bar No. 236165
Beko Reblitz-Richardson, CA Bar No. 238027
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Francisco, CA 94104
Tel.: (415) 293-6800
mmao@bsflp.com
brichardson@bsflp.com

Jesse Panuccio (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
1401 New York Ave, NW
Washington, DC 20005
Tel.: (202) 237-2727
Fax: (202) 237-6131
jpanuccio@bsflp.com

Amanda K. Bonn, CA Bar No. 270891
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel: (310) 789-3100
Fax: (310) 789-3150
abonn@susmangodfrey.com

Attorneys for Plaintiffs

William Christopher Carmody
(admitted *pro hac vice*)
Shawn J. Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
Alexander P. Frawley
(admitted *pro hac vice*)
SUSMAN GODFREY L.L.P.
1301 Avenue of the Americas,
32nd Floor
New York, NY 10019
Tel.: (212) 336-8330
bcarmody@susmangodfrey.com
srabin@susmangodfrey.com
sshepard@susmangodfrey.com
afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)
Ryan J. McGee (admitted *pro hac vice*)
Michael F. Ram (admitted *pro hac vice*)
Ra O. Amen (admitted *pro hac vice*)
MORGAN & MORGAN
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
jyanchunis@forthepeople.com
rmcgee@forthepeople.com
mram@forthepeople.com
ramen@forthepeople.com

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL
CATALDO, EMIR GOENAGA, JULIAN
SANTIAGO, HAROLD NYANJOM,
KELLIE NYANJOM, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' REQUEST FOR GOOGLE
TO USE ADDITIONAL SEARCH
TERMS**

The Honorable Alex G. Tse
Courtroom A – 15th Floor
Trial Date: Not Yet Set

[PROPOSED] ORDER

Before the Court is the parties' Joint Letter Brief regarding Plaintiffs' request for Google to use additional search terms on five custodians' ESI: Dave Monsees, Steve Ganem, Francis Ma, Edward Weng, and Todd Hansen ("Search Term Joint Letter Brief"). Having considered the Search Term Joint Letter Brief, and good cause having been shown, the Court GRANTS Plaintiffs' request.

Google shall run the following search terms across the specified custodians' ESI to locate documents responsive to Plaintiffs' Requests for Productions.

WAA Search Terms (For All Five Custodians)

- !WAA!
- "Web/App"
- W&A!
- "web history"
- WSHH
- WAAH
- web /2 "app activity"
- sWAA
- SMH
- "my history"
- Myhistory
- UDC OR "User Data Controls"
- "activity controls"

Search Terms Relevant to Google's Representations to Users (For All Five Custodians)

- "must be on"
- apps /4 "use Google services"

- “help center”
- “on or off” OR “switch the collection”
- “Privacy Policy”

AdMob Search Terms

For Ed Weng:

- AdMob /50 (firebase OR scion (app! /5 (event OR interact! OR activity OR measure!)) OR appmeasurement OR perform! OR conversion! OR event OR audience OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)
- AdMob AND gold

For the Four Other Custodians:

- AdMob AND (Gold OR analytics OR GA4F OR scion OR firebase OR (app! /5 (event OR interact! OR activity OR measure!)) OR appmeasurement OR !WAA! OR “my account” or “my activity” OR perform! OR conversion! OR event OR audience OR FCM OR “cloud messaging” OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)

Cloud Messaging Search Terms

For Todd Hansen:

- (FCM or “cloud messaging”) /10 (Gold OR analytics OR GA4F OR firebase OR scion OR (app! /5 (event OR interact! OR activity OR measure!)) OR appmeasurement OR “my account” or “my activity” OR perform! OR conversion! OR event OR audience OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)

For the Four Other Custodians:

- (FCM or “cloud messaging”) AND (Gold OR analytics OR GA4F OR firebase OR scion OR (app! /5 (event OR interact! OR activity OR measure!)) OR appmeasurement

OR !WAA! OR “my account” or “my activity” OR perform! OR conversion! OR event
 OR audience OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR
 “Google Mobile Platform” OR GMP)

GA For Firebase Search Terms

For Steve Ganem

- (Analytics OR firebase OR GA4F OR Scion OR “Google Mobile Platform” OR GMP
 AND (Gold OR app! /5 (event OR interact! OR activity OR measure!)) OR !WAA!
 OR “my account” OR “my activity” OR perform! OR conversion! OR event OR
 audience OR AdMob OR FCM OR “Cloud Messaging” OR appmeasurement OR
 “Google mobile service” OR GMS OR Clearcut)

For the Four Other Custodians:

- (“Google Mobile Service” OR GMS OR Clearcut) /10 (Gold OR analytics OR GA4F
 OR firebase OR scion OR “Google Mobile Platform” OR GMP OR (app! /5 (event OR
 interact! OR activity OR measure!)) OR appmeasurement OR !WAA! OR “my
 account” or “my activity” OR perform! OR conversion! OR event OR audience OR
 FCM OR “cloud messaging” or AdMob OR Clearcut)

Search Terms for Other Relevant Products / Services (For All Five Custodians)

- “Real Time” /s bid! OR RTB
- “App Indexing” /50 (“my account” or “my activity” OR !WAA!)

Search Terms Relevant to Google’s Consent Defense (For All Five Custodians)

- (user! OR consumer! OR customer! OR people!) /10 (miscon! OR confus! OR
 !underst! OR comprehend! OR misle! OR consent OR know OR represent! OR
 disclos!)
- CFS OR “Consent Flow Service”

- N^{xxx1}
- N2 OR N3
- “New Ad! Control” OR NAC
- “Consent Bump”

Search Terms Relevant to Google’s Storage and Use of Data (For All Five Custodians)

- (shadow OR secret OR hidden) /2 (profil! OR account)
- PII
- Pseudony!
- Personal! /5 info!
- Zwieback OR Biscotti
- K^{xxx2}
- GAIA
- Footprint!
- T^{xxx3}
- “activity data”
- “app activity”
- “app data”
- associat! /15 (user OR account OR profile)
- correlate /15 (user OR account OR profile)
- UUAD OR “Unified User App Data”
- BigQuery
- Sawmill
- Firelog OR Firedata OR Firestore
- Plog OR “personal log” or GWS

¹ Google has sought to seal this term.

² Google has sought to seal this term.

³ Google has sought to seal this term.

- IT IS SO ORDERED.**

Honorable Alex G. Tse
United States Magistrate Judge